

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

AAL USA, INC. Plaintiff, v. BLACK HALL AEROSPACE, INC., et al., Defendants.	Case No. 2:16-cv-02090-KOB THIS DOCUMENT RELATES TO ALL CASES
AAL GROUP LTD. Plaintiff, v. BLACK HALL AEROSPACE, INC., et al., Defendants.	Case No. 2:17-cv-00399-KOB

MOTION TO WITHDRAW

Oliver Benton Curtis III, and the law firm of Nelson Mullins Broad and Cassel LLP, along with Michael Douglas, and the law firm of Leak, Douglas & Morando, P.C., hereby move to withdraw as counsel for Defendants Keith Woolford and Amy Woolford (the “Woolfords”) in the above-styled cases, and as grounds state:

1. Undersigned counsel seeks to withdraw as counsel for the Woolfords pursuant to Local Rule 83.1(e) and Alabama Rule of Professional Conduct 1.16(b)(5). The Woolfords will not be prejudiced as a result of the requested withdrawal.
2. The Woolfords request the above-styled cases be stayed for a period of thirty (30) days in order to afford them the opportunity to retain new counsel. The parties will not be prejudiced as a result of the requested stay.

3. On November 8, 2018, undersigned counsel conferred with counsel for defendants, Benjamin Coulter. Mr. Coulter advised he does not oppose the requested withdrawal but objects to a stay of the matter.

WHEREFORE, Oliver Benton Curtis III, and the law firm of Nelson Mullins Broad and Cassel LLP, along with Michael Douglas, and the law firm of Leak, Douglas & Morando, P.C., respectfully request this Court enter an order granting its request to withdraw as counsel for Defendants Keith Woolford and Amy Woolford, and staying the above-styled cases for a period of thirty (30) days.

Respectfully submitted,

By: /s/Oliver Benton Curtis III
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*Counsel for Defendants Keith Woolford and
Amy Woolford*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 14, 2018, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Alabama, using the electronic case filing system of the court. I certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2). I also certify that I have served Amy Woolford and Keith Woolford via their personal email addresses.

By: /s/Oliver Benton Curtis III
Oliver Benton Curtis III, Esq. (CUR025)